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19 *Attorneys for Plaintiff Snap Lock Industries, Inc.*

20 **UNITED STATES DISTRICT COURT
21 DISTRICT OF NEVADA**

22 **SNAP LOCK INDUSTRIES, INC.,**

23 Plaintiff,

24 vs.

25 **SWISSTRAX CORPORATION,**

26 Defendant.

27 Case No. 2:17-cv-02742-RFB-PAL

28 **JOINT MOTION AND STIPULATION TO
AMEND DISCOVERY PLAN AND
SCHEDULING ORDER
(FIRST REQUEST)**

29 Pursuant to Local Rule 26-4 and Local Rule IA 6-1 and the Court's May 8, 2018, Order (ECF
30 No. 59), Plaintiff Snap Lock Industries, Inc. ("Snap Lock") and Defendant Swisstrax Corporation
31 ("Swisstrax") hereby respectfully jointly move this Court for an entry of an Amended Discovery Plan
32 And Scheduling Order.

33 1. On May 8, 2018, the Court entered a Discovery Plan and Scheduling Order (the
34 "Scheduling Order") in this case, which set several case deadlines. *See* ECF No. 59. Pursuant to the
35 Scheduling Order, the fact discovery deadline is currently set for September 10, 2018, the dispositive

1 motions deadline is current set for October 10, 2018, and the current deadline for filing the joint
 2 pretrial order is November 9, 2018. *See id.*

3 2. The Scheduling Order also directed the parties to meet and confer as required by Fed.
 4 R. Civ. P. 26(f) not later than May 21, 2018. *See id.*

5 3. The parties conferred pursuant to Rule 26(f) on May 17, 2018, and have submitted a
 6 Rule 26(f) Report and Proposed Discovery Plan (the “Rule 26(f) Report”). *See* ECF No. 60.

7 4. To provide the parties sufficient time to conduct discovery and avoid scheduling
 8 conflicts with other matters, both parties hereby jointly request the Court to modify certain of the
 9 deadlines in the Scheduling Order as set forth in the Rule 26(f) Report to allow adequate time for
 10 discovery in this action. Specifically, the parties jointly request that the discovery cutoff, dispositive
 11 motion deadline, and date for filing the joint pretrial order each be extended by approximately five
 12 weeks.

13 5. This is the first request for extension of these deadlines. No discovery has been
 14 completed in this action to date, beyond the disclosures provided in the parties’ briefings on the
 15 pending motion for preliminary injunction.

16 6. Good cause exists for this request. The parties seek a short five week extension of the
 17 discovery, dispositive motion, and pretrial order deadlines in the Scheduling Order. Modifying
 18 theses deadlines will permit the parties to take discovery in this action and prepare their respective
 19 cases, and avoid scheduling conflicts with other matters. No party will be prejudiced by the
 20 extension requested.

21 7. For these reasons, the parties respectfully request that the Court grant this Joint
 22 Motion and extend the deadlines in the Scheduling Order as follows:

Deadline	Existing Date per Scheduling Order (ECF No. 59)	Proposed New Date
Fact discovery deadline	September 10, 2018	October 19, 2018
Dispositive motion deadline	October 10, 2018	November 19, 2018

Date to file joint pretrial order	November 9, 2018	December 17, 2018
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8. The parties propose that all other deadlines remain as set in the current Scheduling Order.

Dated this 18th day of May, 2018.

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ORDER

IT IS SO ORDERED:

Peggy A. Leen
Hon. Peggy A. Leen
United States Magistrate Judge

DATED: May 22, 2018

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 18th day of May, 2018, I electronically filed a true and correct
3 copy of the foregoing **JOINT MOTION AND STIPULATION TO AMEND DISCOVERY**
4 **PLAN AND SCHEDULING ORDER (FIRST REQUEST)** with the Clerk of Court using the
5 CM/ECF system which will send notification of such filing to all counsel of record.

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8 */s/ Tamara L. Kapaloski*

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